

From: [Farley, Michelle M - DNR](#)
To: [King, Melanie](#); [Goonewardena, Ruhun - DNR](#)
Cc: [David Minkey](#); [Yarbrough, Cody](#); [Eddinger, Jim](#)
Subject: RE: RICE MACT and Generator Test Cells
Date: Wednesday, April 10, 2019 1:16:37 PM

Thank you so much Melanie for your quick response!

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Michelle M. Farley, P.E.

Phone: (920) 662-5495

Michelle.Farley@wisconsin.gov

From: King, Melanie <King.Melanie@epa.gov>

Sent: Wednesday, April 10, 2019 12:29 PM

To: Goonewardena, Ruhun - DNR <Ruhun.Goonewardena@wisconsin.gov>

Cc: Minkey, David M - DNR <David.Minkey@wisconsin.gov>; Yarbrough, Cody <yarbrough.cody@epa.gov>; Eddinger, Jim <Eddinger.Jim@epa.gov>; Farley, Michelle M - DNR <Michelle.Farley@wisconsin.gov>

Subject: RE: RICE MACT and Generator Test Cells

Thanks. Your assessment seems correct to me.

Melanie King

Energy Strategies Group

Sector Policies and Programs Division

Office of Air Quality Planning and Standards

(919) 541-2469

king.melanie@epa.gov

From: Goonewardena, Ruhun - DNR <Ruhun.Goonewardena@wisconsin.gov>

Sent: Wednesday, April 10, 2019 12:40 PM

To: King, Melanie <King.Melanie@epa.gov>

Cc: David Minkey <David.Minkey@wisconsin.gov>; Yarbrough, Cody <yarbrough.cody@epa.gov>; Eddinger, Jim <Eddinger.Jim@epa.gov>; Farley, Michelle M - DNR <Michelle.Farley@wisconsin.gov>

Subject: RE: RICE MACT and Generator Test Cells

Hi Melanie,

The facility manufactures electric engines and generators. At the end of each generator assembly line they test the assembled generators. The facility is an area source for federal HAPs and therefore, is not subject to the NESHAP for Engine Test Cells/Stands (subpart P). The facility tests generators (installed engines) and therefore, the 'test cells' at the facility do not meet the definition of stationary RICE test cell/stand in subpart ZZZZ (RICE MACT). Therefore, it appears that the generators being tested are subject to subpart ZZZZ as per 40 CFR 63.6585.

Thanks.

Ruhun

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Ruhun Goonewardena

Air Management Engineer

Wisconsin Department of Natural Resources

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From: King, Melanie <King.Melanie@epa.gov>
Sent: Wednesday, April 10, 2019 8:43 AM
To: Farley, Michelle M - DNR <Michelle.Farley@wisconsin.gov>
Cc: Minkey, David M - DNR <David.Minkey@wisconsin.gov>; Goonewardena, Ruhun - DNR <Ruhun.Goonewardena@wisconsin.gov>; Yarbrough, Cody <yarbrough.cody@epa.gov>; Eddinger, Jim <Eddinger.Jim@epa.gov>
Subject: RE: RICE MACT and Generator Test Cells

Hi Michelle,

It would be good to know a little bit more about the facility and the testing, but it does sound like they would not be subject to subpart PPPPP if the engines are a final product and already installed in the generators, and they are testing the generators.

Melanie King
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(919) 541-2469
king.melanie@epa.gov

From: Farley, Michelle M - DNR <Michelle.Farley@wisconsin.gov>
Sent: Wednesday, April 10, 2019 8:45 AM
To: King, Melanie <King.Melanie@epa.gov>
Cc: David Minkey <David.Minkey@wisconsin.gov>; Goonewardena, Ruhun - DNR <Ruhun.Goonewardena@wisconsin.gov>
Subject: FW: RICE MACT and Generator Test Cells

Hi Melanie!

Long time no talk! We have a question about whether one of our generator testing facilities might be subject to Subpart ZZZZ.....see situation below.

What do you think?

Thanks!

Michelle

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Michelle M. Farley, P.E.

Phone: (920) 662-5495
Michelle.Farley@wisconsin.gov

From: Minkey, David M - DNR
Sent: Tuesday, April 9, 2019 4:10 PM
To: Goonewardena, Ruhun - DNR <Ruhun.Goonewardena@wisconsin.gov>
Cc: Farley, Michelle M - DNR <Michelle.Farley@wisconsin.gov>

Subject: RE: RICE MACT and Generator Test Cells

Michelle,

Ruhun and I discussed this prior to him e-mailing you and we thought the generator testing at Generac might be subject to ZZZZ based on the following:

- ZZZZ exempts stationary RICE test cell/stand,
- A stationary RICE test cell/stand is an engine test cell/stand as defined in PPPPP,
- PPPPP defines an engine test cell/stand as any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines, and
- Generac tests engines that are installed in gen sets so they don't appear to meet the definition of an engine test cell/stand in PPPPP.

If the generators are subject to ZZZZ, it is difficult to know what requirements apply since the requirements in ZZZZ are dependent on whether the engine is an emergency/limited use engine or not, and how would Generac know what the end-use of the engine is going to be, so how would we decide what requirements apply to the engine generator if that's the case. If I'm missing something and they are exempt from ZZZZ, that makes this a lot easier. But given the testing does not appear to meet the definition of engine test cell/stand, I don't think this is the case.

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Dave Minkey

Phone: (920) 662-5179

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From: Goonewardena, Ruhun - DNR

Sent: Tuesday, April 9, 2019 3:47 PM

To: Minkey, David M - DNR <David.Minkey@wisconsin.gov>

Subject: FW: RICE MACT and Generator Test Cells

fyi

From: Farley, Michelle M - DNR

Sent: Tuesday, April 9, 2019 3:44 PM

To: Goonewardena, Ruhun - DNR <Ruhun.Goonewardena@wisconsin.gov>

Subject: RE: RICE MACT and Generator Test Cells

They are exempt.....they are a test cell.....

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Michelle M. Farley, P.E.

Phone: (920) 662-5495

Michelle.Farley@wisconsin.gov

From: Goonewardena, Ruhun - DNR

Sent: Tuesday, April 9, 2019 3:30 PM

To: Farley, Michelle M - DNR <Michelle.Farley@wisconsin.gov>

Cc: Minkey, David M - DNR <David.Minkey@wisconsin.gov>

Subject: RICE MACT and Generator Test Cells

Hi Michelle,

RICE NESHAP (subpart ZZZZ) applies to stationary RICE except for stationary RICE being tested at a stationary RICE test cell/stand [40 CFR 63.6585].

"Stationary RICE test cell/stand means an engine test cell/stand as defined in subpart PPPPP of this part , that tests stationary RICE". [subpart ZZZZ -40 CFR 63.6675].

Subpart P [40 CFR 63.9375] “ “ Engine Test Cell/Stand means any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines”.

Question

Generac -Oshkosh facility, which is an area source for federal HAPs, assembles generators and tests the assembled generators at “test cells”. Generator testing is not testing uninstalled engines. Therefore, the “test cells” at the Generac facility does not meet the definition of ‘stationary RICE test cell/stand’.

Does this mean generator testing is not exempt from RICE MACT?

Thanks

Ruhun

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Ruhun Goonewardena

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